

DAN M. WINDER, ESQ.  
Nevada State Bar No.: 001569  
LAW OFFICE OF DAN M. WINDER, P.C.  
3507 W. Charleston Blvd  
Las Vegas, NV 89102  
(702) 474-0523  
(702) 474-0631 Fax  
Attorney for Defendant  
**YULI EATON**

DANIEL G. BOGDAN  
United States Attorney  
ANDREW DUNCAN  
Assistant United States Attorney  
333 Las Vegas Blvd. South  
Suite 5000  
Las Vegas, Nevada 89101  
Telephone: (702) 388-6336  
Facsimile: (702) 388-6418

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	Case No. 2:11-cr-00110-RLH-VCF
	)	
Plaintiff,	)	
	)	<b>DEFENDANT, YULI EATON'S</b>
vs.	)	<b>UNOPPOSED MOTION TO EXTEND</b>
	)	<b>STAY IN CHINA</b>
YULI EATON,	)	
	)	
Defendant.	)	Date: December 2, 2011
	)	Trial Date: February 6, 2012

**I.**

**INTRODUCTION**

On March 22, 2011 the Government filed its indictment against YULI EATON ( "Ms. Eaton") on charges involving mail fraud, conspiracy to commit mail fraud and aiding and abetting (18 U.S.C. §§ 2, 1341 and 1349). On October 11, 2011, the Government filed a superceding indictment against Ms. Eaton on charges involving wire fraud, conspiracy to commit wire fraud and aiding and abetting (18 U.S.C. §§ 2, 1343 and 1349).

II.

**MS. EATON'S STAY IN CHINA SHOULD BE EXTENDED**

On November 8, 2011, the Government and Ms. Eaton stipulated and the court ordered that Ms. Eaton would be permitted to regain temporary possession of her passport and to travel to China. The purpose of her trip was to visit her ailing mother. Ms. Eaton agreed to return to the United States and to immediately return her passport to pre-trial services on December 4, 2011.

On November 28, 2011, Ms. Eaton sent word to her counsel via email advising counsel that her mother was in failing health and her illness was dire. Ms. Eaton advised that it is very likely that this would be the last time she would see her mother alive.

Ms. Eaton is requesting that this court permit her to remain in China until shortly after the first of the year. The Government, through AUSA Andrew Duncan, does not oppose this motion.

III.

**CONCLUSION**

For the foregoing reasons, Ms. Eaton respectfully requests that this court grant her motion, in whole and in part, and permit her to remain in China for several additional weeks until shortly after the first of the year in accord with the [Proposed] Order filed concurrently herewith.

DATED: December 2, 2011.

LAW OFFICE OF DAN M. WINDER, P.C.

By: /s/ Dan M. Winder  
DAN M. WINDER, ESQ.  
Nevada State Bar No.: 001569  
LAW OFFICE OF DAN M. WINDER, P.C.  
3507 W. Charleston Blvd  
Las Vegas, NV 89102  
(702) 474-0523  
(702) 474-0631 Fax  
Attorney for Defendant  
**YULI EATON**

DAN M. WINDER, ESQ.  
Nevada State Bar No.: 001569  
LAW OFFICE OF DAN M. WINDER, P.C.  
3507 W. Charleston Blvd  
Las Vegas, NV 89102  
(702) 474-0523  
(702) 474-0631 Fax  
Attorney for Defendant  
**YULI EATON**

DANIEL G. BOGDAN  
United States Attorney  
ANDREW DUNCAN  
Assistant United States Attorney  
333 Las Vegas Blvd. South  
Suite 5000  
Las Vegas, Nevada 89101  
Telephone: (702) 388-6336  
Facsimile: (702) 388-6418

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
YULI EATON, )  
 )  
Defendant. )

Case No. 2:11-cr-00110-RLH-VCF

~~PROPOSED~~ ORDER RE:  
DEFENDANT, YULI EATON'S  
UNOPPOSED MOTION  
TO EXTEND STAY IN CHINA

Date: December 2, 2011  
Trial Date: February 6, 2012

**ORDER**

The Motion to Extend Defendant YULI EATON's Stay in China was taken under submission by this court. Having considered the terms of the proposed order, the memorandum of points and authorities and the record herein, it is hereby:

**ORDERED** that Motion to Extend Defendant YULI EATON's Stay in China is GRANTED.

SIGNED this 5th day of December, 2011.

  
United States Magistrate Judge